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March 22, 2024

**Via ECF**Hon. Philip M. Halpern, U.S.D.J.  
The Hon. Charles L. Brieant Jr. Federal Building and Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150Re: *Wolf v. Dolgen New York, LLC*  
Case No.: 7:23-cv-00558-PMH

Dear Judge Halpern:

As you are aware, The Dann Law Firm along with Milberg represent Plaintiffs Joseph Wolf, Carmen Wolf, and the putative class (collectively, the “Wolfs”) in the above referenced matter against Dolgen New York, LLC d/b/a Dolgen (“Dollar General”, the parties collectively, the “Parties”). In accordance with Paragraph 10 of the Second Amended Civil Case Discovery Plan and Scheduling Order, D.E. 47, the Parties submit this joint letter concerning settlement and mediation.

The parties have discussed and intend to proceed with a mediation in the near future. The parties have decided on a mediator, and pending further discussion about a couple of issues, will work to finalize a date.

Respectfully submitted,

**THE DANN LAW FIRM, PC**/s/ Javier L. Merino  
Javier L. Merino, Esq.  
*Counsel for Plaintiffs and the Putative Class***MCGUIREWOODS LLP**/s/ R. Trent Taylor  
R. Trent Taylor, Esq.  
*Counsel for Defendant Dolgen New York, LLC*